IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

ANGELA L. RUCKMAN,)	Case No. 5:21-cv-00923-BMB
Plaintiff)	Judge Bridget Meehan Brennan
VS.)	
PHH MORTGAGE CORPORATION d/b/a PHH MORTGAGE SERVICING, et al.,))	
Defendants.)	
)	

STIPULATION OF FACTS

Plaintiff Angela Ruckman and Defendant PHH Mortgage Corporation d/b/a PHH Mortgage Servicing, for their Stipulation of Facts state as follows:

- 1. On August 24, 2005, plaintiff Angela Ruckman executed a promissory note in the amount of \$83,000.00 and a mortgage securing to note for the property located at 837 South Main St. in Mansfield, Ohio.
 - 2. Defendant PHH is the current servicer of the Loan.
- 3. Plaintiff experienced a financial hardship and became delinquent on her loan on or around April 1, 2019.
- 4. On March 5, 2020, Defendant filed a foreclosure lawsuit against Plaintiff in the Richland County Court of Common Pleas.
 - 5. In July 2020, Plaintiff completed a loss mitigation application.
 - 6. On August 5, 2020, Defendant acknowledged the complete application.
 - 7. On August 12, 2020, Defendant offered Plaintiff a trial modification plan.

- 8. Plaintiff made all three trial payments under the trial modification plan for the trial payments of September, October, and November of 2020.
- 9. On November 6, 2020, Defendant offered Plaintiff a permanent modification which included a Loan Modification Agreement.
- 10. To accept the Permanent Loan Modification Offer, Plaintiff was to provide payment and the executed Loan Modification Agreement to Defendant no later than November 24, 2020.
- 11. On November 16, 2020, Defendant also emailed Ruckman a copy of the permanent modification documents.
- 12. In late November, 2020, Plaintiff asked for additional time to review the modification documents.
- 13. On December 1, 2020, Defendant told Plaintiff that she had been granted an extension until December 31, 2020, to return the signed modification documents.
- 14. On March 29, 2021, Clunk Hoose filed a motion for summary judgment in the foreclosure lawsuit.
 - 15. On May 4, 2021, Plaintiff filed this lawsuit.
 - 16. On August 23, 2021, the loan modification was implemented.
 - 17. On August 30, 2021, the foreclosure lawsuit was voluntarily dismissed.
 - 18. The loan modification is still in effect and Plaintiff is current on her payments.

Dated: February 28, 2023

PHH MORTGAGE CORPORATION d/b/a PHH MORTGAGE SERVICING

By: /s/Simon Fleishmann (via email consent)

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ANGELA L. RUCKMAN

By: /s/ Daniel M. Solar

Daniel M. Solar (0085632) Marc E. Dann (0039425) Michael A. Smith Jr. (0097147)

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CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing document was electronically filed and served via the ECF system on February 28, 2023.

/s/ Daniel M. Solar

Daniel M. Solar (0085632)